

Delegated Report (Member's Briefing)		Analysis sheet		Expiry Date:	21/10/2020
		N/A		Consultation Expiry Date:	05/10/2020
Officer			Application Number(s)		
Josh Lawlor			2020/3958/P		
Application Address			Drawing Numbers		
1-161 Taplow Adelaide Road London NW3 3NU			See Draft Decision Notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Installation of 6 pole mounted antennas (2 each on 3 poles), 3 cabinets, 3 dishes and 3 RRU's (remote control radio units) fixed to poles on a tripod frame (5 on each tripod).					
Recommendation(s):		Prior Approval Required - Approval Given			
Application Type:		GDPO Prior Approval Determination			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice					
Informatives:						
Consultations						
Adjoining Occupiers:	No. notified	0	No. of responses	15	No. of objections	15

**Summary of
consultation
responses:**

Multiple site notices were erected around the site:

- 1 x on Adelaide Road
- 1 x Hornby Close
- 1 x Fellows road - near 141
- 1 x Winchester Road
- 1 x on King Henry's Road - near Marriotts Hotel

These were posted on 11/09/2020 (expiring 05/10/2020).

15 objections have been received from separate addresses. The objections are summarized below:

1. The implications of 5G on human health. Would like to see independent testing. The lack of evidence showing that 5G does not cause serious harm to human health. Concern for my own health and my family who have specific health conditions that could be made worse. Other countries are taking a more precautionary approach to the roll out of 5G. All humans are sensitive to environmental electromagnetic fields (EMF), both natural and manmade. Surveys suggest that up to 40% of the general population link symptoms to environmental man-made EMFs. The degree of environmental sensitivity to EMF energy depends on the individual. It ranges from high sensitivity, producing severe symptoms for a few, to some people who feel little or no symptoms.
2. Implications for health wildlife 5G is known to affect insects, bees, plants, and humans.
3. Harm to adjacent conservation areas and host building Taplow is in the middle of two conservation areas, the apparatus would be unsightly and cause harm to the clean roofline and townscape. The pole mounted antenna would appear as almost another storey. The equipment looks ugly and would mar the skyline. The pole mounted antenna would be visible from my window.
4. Lack of need for telecoms equipment I would like the council to slow down in their implementation of 5G, when 3G and 4G are perfectly adequate. This is an application for a completely new base station site in an area where Telefonica/O2 already has some 3 or 4 other base station sites within a 250m-300m radius, and as a result it must be closely scrutinised by Council Officers and local affected residents to determine whether it is necessary. EE are already covering a wide area; transmitting 5G - at least from nearby Dorney Tower and the Marriott hotel. Telefonica/O2 are "already progressing a site on Centre Heights" and are "already present on Langhorne Court. Given this, there seems to be no rationale for approving this application, especially considering the NPPF requirement for Local Planning Authorities "to keep the number of radio and electronic communications masts, and the sites for such installations to a minimum".
5. Inadequate consultation the site notice was not displayed in front of Taplow Road, there is a need for the applicant to re-consult due to

Covid-lockdown, need for type of antenna being proposed on development description, letters should have been sent out to addresses in the building

6. Other There is constant building work taking place at Taplow which disrupts our lives. The maintenance of the equipment would cause disruption. The building itself needs repair and maintenance

Officer response to points above

- 1-2. *The prior approval is assessed by the LPA in terms of siting and design, not in terms of potential health impacts. Beyond requiring certification of proposals meeting International Commission on Non-Ionizing Radiation Protection (ICNIRP) guidelines the local planning authority is unable to consider health impacts as part of the consideration of a GDPO prior approval determination application. The National Planning Policy Framework is explicit about this [Section 10 - NPPF](#). The applicant has declared that all of the proposed equipment would comply with ICNIRP standards on emission levels. Thus, the equipment is not anticipated to have any direct impact on public health. It is also noted that there is limited, if any, evidence of links to health risks - and there is no reason to think the actual signal strength would pose any more harm than having WiFi, a mobile phone, house alarm, TV or other such electrical equipment at home.*
3. *The proposal would not cause harm to the adjacent conservation areas, the antennas are of a modest scale in relation to the height and scale of the tower. It is noted that a private view is not a material planning consideration and the visibility of the antenna from surrounding windows is considered minor. See Siting and design section of report*
4. *This is a prior approval application, meaning the 'need' for the equipment is seen as justified or required. Para 116 of the NPPF states that 'Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure. The assessment of this GDPO Prior Approval Determination is based on siting and design. A new site is needed for 5G coverage. The NPPF para 113 states that 'where new sites are required such as for new 5G networks'. See justification section of report for further detail.*
5. *The applicant has complied with relevant consultation requirements as necessary for this GDPO Prior Approval Determination. The Council has no evidence to contradict their supporting information which documents their consultation process with schools, residents and Ward Councillors. The type of antenna is described in the supporting documents and clearly described in the development*

	<i>description in terms of scale and location. There is no requirement to list the type of connection being used in the development description. Multiple site notices were displayed in accordance with the Councils adopted Statement of Community Involvement.</i> 6. <i>The equipment would not need significant maintenance and is not relevant in assessing the application. The installation of the equipment would also not cause significant disruption. The upkeep of the building and other building works in the area are not material to the assessment.</i>
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Site Description

The application site is located on 1- 161 Taplow, a fifteen storey residential building, on Adelaide Road. The building does not hold significant architectural value, but is highly prominent within the local townscape. The site is not located within a Conservation Area, although is located approx. 116m away from Elsworth Conservation Area and 87m from Eton Conservation Area.

Relevant History

None relevant to the proposal

Relevant policies

The National Planning Policy Framework (NPPF) 2019 –
Chapter 10 Supporting high quality communications

London Plan 2016, consolidated with alterations since 2011
Intenf to publish London Plan 2019

Camden Local Plan 2017

- G1 - Delivery and location of growth
- D1 – Design
- D2 –Heritage
- A1 - Managing the impact of development
- A4 - Noise and vibration

Camden Planning Guidance :

- [Design CPG - March 2019](#)
- [Digital Infrastructure CPG - March 2018](#)
- [Amenity CPG - March 2018](#)

Assessment

1. Proposed Development

- 1.1. This application was submitted under Part 16, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (GPDO). The application is to assess whether Prior Approval for the acceptability in siting and appearance is required. As such, it is not possible for objections to be raised on any other grounds, such as impacts to health or transport.
- 1.2. The proposal would include:
- Installation of 6 pole mounted antennas, with 2 antennas each on each pole and a total of 3 poles. The pole mounted antennas would be installed at the roof edge of each elevation and have a height of 3.25 from roof level.
 - 3 cabinets, 3 dishes
 - 3 RRU's (remote control radio units) fixed to poles on a tripod frame (5 on each tripod)
- 1.3. Antennas would be installed on three sections of the rooftop, 2 antennas located to the north of the rooftop, 2 antennas located to the south and 2 antennas located to the west of the rooftop. The application was submitted on behalf of Cornerstone and Telefonica Cornerstone and Telefonica UK Ltd who would operate the equipment to improve 5G coverage within the local area. The installation would provide coverage for Telefonica and for multiple technologies: 2G, 3G, 4G and new 5G network coverage

2. Justification

- 2.1. The NPPF requires Local Planning Authorities to keep the number of radio and electronic communications masts, and the sites for such installations to a minimum, consistent with the needs of consumers, the efficient operation of the network and to provide reasonable capacity for future expansion. Use of existing masts, buildings and other structures for new electronic communications capability (including wireless) should be encouraged. Where new sites are required (such as for new 5G networks, or for connected transport and smart city applications), equipment should be sympathetically designed and camouflaged where appropriate.
- 2.2. There is a need for enhanced coverage, enhanced coverage for 4G in and around the Belsize area. This is demonstrated by the submitted plot coverage maps within the Supplementary Information document (SSSI) page 5 shows '4G coverage'. Notably the coverage plots show that this residential area has in-car or indoor suburban coverage, whereas the proposal results in improved indoor dense urban coverage.
- 2.3. The installation would be providing new 5G network coverage for Telefonica in the area. This site would also provide a dish link to multiple sites and so would be offloading and distributing traffic from these neighbouring sites, so therefore providing additional coverage.
- 2.4. The NPPF requires consideration to be had of siting proposed equipment on existing masts in the area and requires the overall numbers of masts to be kept to a minimum required for efficient network operation. CPG Digital Infrastructure (March 2018) encourages the use of existing

masts, buildings and other structures for new telecoms equipment proposals. As part of the site search in the supporting documentation (SSSI page 14-15), the applicants have referenced 9 other sites and buildings, but states that these are considered *unsuitable for radio coverage or inappropriate as the equipment would result in greater visual impact than the currently proposed one, or coverage would be impacted due to close proximity to taller buildings of Taplow*'.

- 2.5. The potential sites are considered in terms of their technical suitability to provide the required level of service, the effect on visual amenity and their ability to be acquired, built and maintained. The aim of site identification is to find the most technically efficient site, which has the minimum impact on visual amenity. A balance between technical efficiency and visual amenity must be achieved. The applicant has undertaken a search process during which all reasonable potential alternatives siting options have been discounted. The local planning authority has no evidence to discount the reasons presented.
- 2.6. The developer has submitted technical information stating that the proposed telecommunication equipment would accord with all relevant legislation and as such would not cause interference with nationally significant electrical equipment such as air traffic services.
- 2.7. UK Government Research in the Stewart Report (2000) advocated a precautionary approach to telecommunications development and identified that children are more susceptible to telecommunications radiation. The NPPF does not make reference to the precautionary approach directly, but does carry forward the principle of the consideration of the siting of masts close to schools through the requirement for developers to pre-consult with local schools. The applicant has sent consultation letters to the UCL Academy, Swiss Cottage School, Trevor Rivers School, Swiss Cottage Leisure Centre and Swiss Cottage Nursery on 10th March 2020. At the date of submission no response was received.
- 2.8. The NPPF states that the LPA should not determine health safeguards if the proposal meets International Commission guidelines for public exposure provided an ICNIRP certificate has been submitted. The applicant has declared that all of the proposed equipment would comply with International Commission on Non-Ionizing Radiation Protection (ICNIRP) standards on emission levels. The antennae are so high that they do not directly face any residential premises or habitable windows. Thus the mast is not anticipated to have any direct impact on public health. There will be no impact on residential amenity in terms of loss of light or outlook.

3. Siting and design

- 3.1. There are two main elements to a radio base station; the cabinets which contain the equipment used to generate the radio signals, the supporting poles that holds the antennas in the air and the antennas themselves, which emit the radio signals (along with any necessary amplifier or receiver units). Other elements necessary for the base station to function are the links into the network either by fibre cabling or by dish antennas, power source (meter cabinet), and feeder cables that link the equipment housing to the antennas and the various fixings.
- 3.2. The 5 cabinets are setback from the edge and are typical utilitarian grey metal box structures to be found on rooftops. They would not be visually prominent from within the public realm, thus it is considered that the proposed cabinets are not obtrusive in terms of their siting, size or design.

- 3.3. The 6 antennas, 2 each on 3 poles, would rise 3.25 metres above the roofline and would be visible from Winchester Road, Adelaide Road, Fellows Road and Harley Road. However the equipment would not be readily visible from ground level given the height of the tower (65m). The level and scale of buildings in the area, combined with the road layouts, means that views of the building and antennas would be limited in a number of the longer views from roads listed above. It is considered that the pole mounted antennas with a height of 3.25 from roof level, would not be harmful to the appearance of the building or wider townscape. The 3.225m height of the antenna would appear relatively minor when viewed from street level. The antennas would be discernible at ground level in some glimpse views, although given their scale and the height of the building, the antennas would not appear dominant in these views. The equipment would be visible from a small section of Harley Road which leads on to Adelaide Road (Elsworthy Conservation Area) and sections of Fellows Road (Belsize Conservation Area). The visibility of the equipment from these areas within the Elsworthy Conservation Area and Belsize Conservation Area is not considered harmful to the setting of non-designated heritage assets that are within these conservation areas. Overall there would be no harm to the character or appearance of the adjacent conservation areas. The antenna would also cause harmful impacts to the setting of any listed buildings in the area.
- 3.4. While the clean roofline of the building would be somewhat undermined, this is not sufficiently harmful or obtrusive to would warrant a refusal. The antennas would be coloured grey as this would reduce the capacity of the equipment to draw the eye when viewed against the sky. The local planning authority must also consider the public benefits of increased 5G connectivity against the alteration to the otherwise clean roofline.
- 3.5. It is considered that there is no alternative design which would have less visual impact on the building and wider townscape. If the antennas were moved back then they would be clipped by the rooftop edges and therefore require taller support structures. The pole mounts used in this case, considered more visually appropriate than grouping the antennas in a much taller structure.
- 3.6. Considerable importance and weight has been attached to the harm and special attention has been paid to the desirability of preserving or enhancing the character or appearance conservation area, under s. 72 of the Listed Buildings and Conservation Areas Act 1990 as amended by the Enterprise and Regulatory Reform Act (ERR) 2013.

6. Recommendation

- 6.1 Prior Approval Required – Approval granted.

The decision to refer an application to Planning Committee lies with the Director of Regeneration and Planning. Following the Members Briefing panel on Monday 12th October 2020, nominated members will advise whether they consider this application should be reported to the Planning Committee. For further information, please go to www.camden.gov.uk and search for 'Members Briefing'.